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13 SENTIUS INTERNATIONAL, LLC

14

15   UNITED STATES DISTRICT COURT

16   NORTHERN DISTRICT OF CALIFORNIA

17 ZOHO CORPORATION,   CASE NO. 4:19-cv-00001-YGR

18   Plaintiff,   **DECLARATION OF ROBERT J. YORIO IN**
                                      SUPPORT OF DEFENDANT AND
19   v.   **COUNTERCLAIMANT SENTIUS**
                                      INTERNATIONAL LLC'S OPENING CLAIM
20 SENTIUS INTERNATIONAL, LLC   **CONSTRUCTION BRIEF**

21   Defendant.

22 SENTIUS INTERNATIONAL, LLC,   DATE: March 18, 2020
                                      TIME: 9:30 a.m.
23   COURTROOM: 1
            Counterclaimant,   JUDGE: Honorable Yvonne Gonzalez Rogers
24   v.

25
ZOHO CORPORATION and ZOHO
26 CORPORATION PVT., LTD.

27   Counter-Defendants.

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DECLARATION OF ROBERT J. YORIO IN SUPPORT OF DEFENDANT AND COUNTERCLAIMANT
SENTIUS INTERNATIONAL LLC'S OPENING CLAIM CONSTRUCTION BRIEF

1   I, Robert J. Yorio, declare:

2   1.   I am one of the attorneys of record for Defendant and Counterclaimant, Sentius

3   International, LLC ("Sentius") in this action. I have prepared this declaration in support of

4   Defendant and Counterclaimant, Sentius International, LLC's (SENTIUS) Opening Claim

5   Construction Brief. The following facts and documents set out herein are within my knowledge,

6   and if called as a witness to testify herein, I could and would competently testify to the truth

7   thereto.

8   2.   Exhibit 1 is a true and correct copy of the U.S. Reissued Patent RE 43,633E dated

9   September 4, 2012 entitled "System and Method for Linking Streams of Multimedia Data to Reference

10   Material for Display" (the '633 Patent).

11   3.   Exhibit 2 is a true and correct copy of the U.S. Patent No. 7,672,985 dated March

12   2, 2010 entitled "Automated Creation and Delivery of Database Content" (the '985 Patent).

13   4.   Exhibit 3 is a true and correct copy of the Agreed Claim Construction Order (Dkt.

14   87; filed September 22, 2017), *Sentius International, LLC v. Blackberry Limited and Blackberry*

15   *Corporation* (ED-TX Case No. 2:16-cv-773-RSP).

16   5.   Exhibit 4 is a true and correct copy of Claim Construction Order (Dkt. 66; filed

17   January 9, 2014), *Sentius International, LLC v. Microsoft Corporation* (NDCA Case No. 5:13-

18   cv-00825-PSG).

19   6.   Exhibit 5 is a true and correct copy of Claim Construction Order (filed May 26,

20   2005), *Friskit, Inc. v. RealNetworks, Inc., and Listen.Com* (NDCA Case No. C03-5085-FMS).

21   7.   Exhibit 6 is a true and correct copy of Order Re: Construction of Claim 8 of U.S.

22   Patent No. 5,822,720 (Dkt. 52-7; filed March 29, 2002), *Sentius Corporation v. Flyswat, Inc.*

23   (NDCA Case No. C00-02233 SBA).

24   8.   Exhibit 7 are true and correct copies of selected pages from the publication

25   entitled, "Document Image Understanding: Geometric and Logical Layout", pps. 386, 387, 389,

26   Robert M. Haralick, Electrical Engineering FT-10 University of Washington, Seattle, WA 98115

27   - 1994 IEEE.

28   9.   Exhibit 8 is a true and correct copy of the publication entitled, "A Structure Editor

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DECLARATION OF ROBERT J. YORIO IN SUPPORT OF DEFENDANT AND COUNTERCLAIMANT
SENTIUS INTERNATIONAL LLC'S OPENING CLAIM CONSTRUCTION BRIEF

1 for Abstract Document Objects", Gary D. Kimura, pps. 418, 422, 430-435 (1986) Member,

2 IEEE, IEEE Transactions on Software Engineering, SE-12, No. 3, March 1986 - 1986 IEEE.

3   10.   Exhibit 9 is a true and correct copy of the publication entitled, "Document

4 Formatting Systems: Survey, Concepts, and Issues", Richard Furuta, Jeffrey Scofield, and Alan

5 Shaw, pps. 419, 420, 432, 447-449 (1982), Department of Computer Science, University of

6 Washington, Seattle, Washington, 89195, Computing Surveys, Vol. 14, No. 3, September 1982.

7   11.   Exhibit 10 is a true and correct copy of the publication entitled, "Ten Years of

8 Window Systems - A Retrospective View", p. 36, Warren Teitelman, F. R. A. Hopgood et al.

9 (eds.), Methodology of Window Management - EUROGRAPHICS The European Association

10 for Computer Graphics (1986).

11   12.   Exhibit 11 is a true and correct copy of the excerpts from the publication entitled,

12 "The Text Editor Sam", pps. 6-8, 12, 14, 18, Rob Pike - rob@plan9.bell−labs.com.

13   13.   Exhibit 12 is a true and correct copy of U.S. Patent No. 5,436,637 - issued July

14 25, 1995 entitled "Graphical User Interface System and Methods for Improved User Feedback".

15 Inventors: Charles E. Gayraud; Perry A. Gee.

16   14.   Exhibit 13 is a true and correct copy of U.S. Patent No. 5,581,670 - issued

17 December 3, 1996 entitled "User Interface Having Movable Sheet with Click-Through Tools.

18 Inventors: Eric A. Bier; William A. S. Buxton.

19   15.   Exhibit 14 is a true and correct copy of Emacs - Version 18.59

20 (ftp://ftp.gnu.org/old-gnu/emacs/) and VI (VIM) Version 3.0 (ftp://ftp.vim.org/pub/vim/unix).

21   16.   Exhibit 15 is a true and correct copy of a definition of the word "lookup" from the

22 Microsoft Press, *Computer Dictionary: The Comprehensive Standard for Business, School,*

23 *Library, and Home*, pp. 216-17 (1991).

24   17.   Exhibit 16 is a true and correct copy of the European Patent Publication No.

25 0266001A2, "A Parser for Natural Language Text". Applicant: International Business Machines

26 Corporation. Inventors: Antonio Zamora; Michael D. Gunther; Elena M. Zamora.

27   18.   Exhibit 17 is a true and correct copy of the definition of the word "parse" from the

28 Microsoft Press, *Computer Dictionary: The Comprehensive Standard for Business, School,*

DECLARATION OF ROBERT J. YORIO IN SUPPORT OF DEFENDANT AND COUNTERCLAIMANT
SENTIUS INTERNATIONAL LLC'S OPENING CLAIM CONSTRUCTION BRIEF

1 | *Library, and Home*, p. 292 (2nd ed., 1994).

2 | 19.   Exhibit 18 is a true and correct copy of the definition of the word "offset" from

3 | the Random House Personal Computer Dictionary, Philip E. Margolis (2nd ed. 1996), p. 346.

4 | 20.   Exhibit 19 is a true and correct copy of excerpts from the publication entitled, "A

5 | Description of the Model-View-Controller User Interface Paradigm in the Smalltalk-80 System",

6 | Figures 1, 7, 16, Glenn E. Krasner and Stephen T. Pope, ParcPlace Systems, Inc., 1550 Plymouth

7 | Street Mountain View, CA 94043 - 1988 ParcPlace Systems.

8 | 21.   Exhibit 20 is a true and correct copy of the definition of the word "array." (n.d.)

9 | Christensson, P. (2007, October 17). Retrieved 2017, May 24, from

10 | https://techterms.com/definition/array

11 | 22.   Exhibit 21 are true and correct copies of definitions of the words "link", "lookup"

12 | and "offset" from The Computer Glossary: The Complete Illustrated Dictionary, Alan Freedman

13 | (7th ed. 1995), pps. 224, 268, 276.

14 | 23.   Exhibit 22 is a true and correct copy of Patent Application No. 11/554,241,

15 | Request for Extension of Time and Responsive Amendment Under 37 C.F.R. §1.111 dated

16 | September 14, 2009.

17 | 24.   Exhibit 23 is a true and correct copy of U.S. Patent No. 8,214,349B2 dated July 3,

18 | 2012 entitled, "Automated Creation and Delivery of Database Content." Inventors: Marc

19 | Bookman, David Kurtz and Niket Patwardhan.

20 | 25.   Exhibit 24 is a true and correct copy of International Application Published Under

21 | the Patent Cooperation Treaty (PCT), entitled, *A Method of Specifying Links in Hypermedia,*

22 | WO 95/04974, dated February 16, 1995, pps. 1-4**.**

23 | I declare under penalty of perjury under the laws of the United States that the foregoing is

24 | true and correct.

25 | Executed on this 31st day of January 2020 at Washington, D.C.

26 |

27 | _____/s/ Robert J. Yorio_____
ROBERT J. YORIO

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DECLARATION OF ROBERT J. YORIO IN SUPPORT OF DEFENDANT AND COUNTERCLAIMANT
SENTIUS INTERNATIONAL LLC'S OPENING CLAIM CONSTRUCTION BRIEF